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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: Office of the Secretary
Federal Communications Commission
Washington D.C. 20554

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FCC MAIL ROOM

FROM: Deschutes County Sheriff
1100 N.W. Bond Street
Bend, Oregon 97701

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENT

All communications associated with this department are performed as a public safety service and according to FCC priority rules, public safety ranks second only to National Defense Communications. With the FCC's current proposal, it is felt that this priority is inconsistent with the statutory priority.

By refarming the 150-174 band, our current bandwidth allocation would decrease by approximately 25%. The number of channels would increase by approximately 450. The bandwidth, however will not allow for the quality of communications currently available. The increase in the number of channels would then be counteracted by the lack of quality. The technology available today and in the foreseeable future relative to Channel spacing and occupied bandwidth (Dockets No. 88-413 and 88.421), will not allow DESCHUTES COUNTY SHERIFF to meet these requirements by January 1, 1996. We would then be put in non-compliance with the new rules. The equipment that the County currently uses is not capable of being modified to meet the proposed specifications and the only solution available would be to replace our communications system entirely.

Replacing our system with a service similar to the present one would cost the County approximately \$1,523,267.00, which is about one-third of our annual operating budget. With the budgetary constraints that are already in place, replacement within the next three years is not realistic.

Power and antenna height limits (Docket No. 88-429) creates numerous areas where signal penetration would be non-existent. In all cases our mobil relay sites are in excess of the 590 foot HAAT. The output from our transmitters would be reduced to 5 watts. In order to overcome the loss of area coverage, we would have to provide a minimum of five sites. By meeting these minimum

In summary, our thoughts and concerns towards this change are as follows. It would be all but impossible for this office to afford the cost of a system change. To negotiate with the proper agencies in order to increase the number of transmitter sites so we can